The BURKE-PARSONS-BOWLBY Corporation

P. O. BOX 86 • GOSHEN, VIRGINIA 24439 • PHONE: (540) 997-9251
FAX: (540) 997-0047

PRESSURE TREATED
WOOD PRODUCTS

October 19, 2004

Ms. Jeanne R. Henry (3WC31)
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

RE: Burke-Parsons-Bowlby Response to August 13, 2004 Request for Information Pursuant to Section 3007(a) of the Resource Conservation and Recovery Act, 42 U.S.C. 6927(a) Information Request – Reference No. C04-011
EPA ID No. VAD005027560

Dear Ms. Henry:

Burke-Parsons-Bowlby (BPB) is pleased to present the enclosed supplemental information pursuant to the April 8, 2003 inspection of Burke-Parsons-Bowlby Corporation in Goshen, Virginia ("BPB" or "Facility"), as requested in the referenced Request for Information dated August 13, 2004.

Also enclosed is the requested certification.

Sincerely,

Doug Gentry
Division Manager
Burke-Parsons-Bowlby Corporation

CERTIFICATION

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature: Doug Gentry

Doug Gentry
Division Manager
Burke-Parsons-Bowlby Corporation

Response to Information Request

1. *With regard to the Facility's creosote wood treating processes, please answer the following:*

   a) *Please state and describe in specific detail the type(s) of pressure vacuum treatment(s) utilized at the Facility (e.g., empty-cell, full-cell).*

   Response: The BPB Facility primarily utilizes an Empty Cell process to treat wood with creosote or CCA, with the full cell process being used sparingly. The Goshen plant follows the industry standard process for Empty Cell and Full Cell Processes as fully described in the Attachment A documents: "American Wood-Preservers' Association Standard C1-03" and "10.3 Wood Preserving," Pages 10.8-1 through 10.8-3.

   b) *Please state and describe in specific detail what type(s) of conditioning steps (e.g., air seasoning, Boulton process) are utilized by the Facility to reduce the amount of moisture in the wood.*

   Response: Both air seasoning and the Boulton process are used at the Facility, with air seasoning being used more predominantly. When utilizing the Boulton process, the Facility practices industry standards as more fully described in the Attachment A documents referenced in the preceding response. In addition, Attachment A also contains detailed operating instructions for pressure treating with creosote.

   c) *Please submit a detailed process flow diagram of the Facility's creosote wood treating process. Please be sure to include the input of raw materials and chemicals and the waste sources resulting from the operation of each unit.*

   Response: See "Flow Diagram", Attachment B.

   d) *During the creosote treatment process, from start to finish, is water, in any phase (i.e., liquid, vapor) generated and/or removed from the retort(s)? If so, please answer the following questions:*

      i *Please explain in specific detail 1) if the water generated is vented to the atmosphere or 2) how and in what type of unit the water generated during the treatment process is accumulated in once it exits the retort(s) (i.e., condensation unit).*

Response: Water vapor is generated during the Boulton process and condensed in a condensation tank.

ii. *After the water has been removed from the retort(s), is it sent through a waste water treatment process? If so, please answer the following:*

1 *Explain in specific detail each step involved in the waste water treatment process.*

2 *Is the treated waste water discharged under a NPDES permit? If so, please provide a copy of the Facility's NPDES permit.*

3 *Is the treated waste water discharged to a Publicly Owned Treatment Works (POTW)? If so, please provide the name and address of the POTW, as well as a copy of the indirect discharge agreement.*

Response: A waste water treatment process is not utilized.

iii. *If the water generated during the creosote wood treatment processed is not treated in a waste water treatment process, please answer the following questions:*

1 *Explain in specific detail how the Facility manages the water from the time it exits the retort(s) until its final disposition (e.g., returned to the process, disposed).*

2 *Submit a detailed process flow diagram which shows each of the steps the Facility follows for managing the water from the time it exits the retort until its final disposition (e.g., returned to the process, disposed).*

Response: Water vapor generated during the Boulton process is condensed in a condensation tank. The condensate is collected in the work tank and then sent to the evaporator.

iv. *Is the water at any time placed in an evaporator unit? If so, please answer the following questions:*

Response: Yes.

1 *Please state the volumetric size of the evaporator unit.*

Response: 6000 gallons.

2 *Is the evaporator unit open or closed topped. If closed topped, is the unit equipped with a vent?*

Response: Closed topped with vent.

3 *Is the evaporator unit hard piped into the creosote treatment process? If not, please explain how the water is added to the evaporator unit.*

Response: The evaporator unit is hard piped into the creosote treatment process.

4 *Is any residue or sludge type material generated as a result of the evaporation process? If so, please explain in specific detail how the Facility manages/handles the residue/sludge type material generated as a result of the evaporation process.*

Response: No sludge is generated as a result of the evaporation process.

2. *With regard to the Facility's Drip Pad, please answer the following questions:*

a) *Provide the date on which the drip pad was constructed.*

Response: The drip pad was constructed in 1986.

b) *Provide the date on which the most recent written assessment of the drip pad was conducted. Was the assessment reviewed and certified by an independent, qualified registered professional engineer?*

Response: An independent, qualified, registered professional engineer from Boyles and Hildreth, 108 Court Street, Spencer, West Virginia, visually inspected the existing drip pad and certified the Facility on June 21, 2004. A copy of this certification is included in Attachment C.

c) *Submit a copy of the most recent written assessment of the Facility's drip pad.*

Response: A copy of the most recent written assessment of the Facility's drip pad dated June 21, 2004, is included in Attachment C. Also included in

Attachment C is a copy of the certification in place at the time of the April 8, 2004 CEI inspection, dated June 18, 2003. Both certification assessments reference an "original certification" conducted by Boyles and Hildreth dated June 28, 1995. This original certification is also included in Attachment C.

d) *Is the drip pad inspected after storms?*

Response: The drip pad is inspected after storms and assessed for deterioration of the drip pad surface and for proper operation of run-on and run-off controls and collection systems.

e) *Please submit any and all inspection records the Facility has for the drip pad for the time period of April 1, 2000 up to the receipt of this letter.*

Response: Inspection records for the time period April 1, 2000 to the present are included in Attachment D.

2. *(Second Question No. 2)*
During the April 8, 2004 inspection, the inspectors noted that the perimeter of the Facility's drip pad was not surrounded on all sides by a curb or berm. Please explain why the Facility's drip pad was not constructed with a curb or berm surrounding the entire perimeter as required by the Virginia Hazardous Waste Management Regulations as(VaHWMR) 9 VAC 20-60-165, which incorporates by reference 40 CFR § 265.443(a)(3). If the Facility disagrees with this observation, please submit photographs showing the curb or berm that surrounds the drip pad on all sides. Please be sure that for each photograph submitted, to explain what side of the drip pad is being shown in the photograph.

Response: Both the 2003 and the 2004 Drip Pad Assessment reports certified the drip pad pursuant to requirements of 40 CFR Subpart W. The following quote from Section B of the June 18, 2003 Drip Pad Assessment Report addresses those requirements specific to 40 CFR § 265.443(a)(3):

> "The pad is approximately one hundred twenty (120) feet in width and one hundred fifty (150) feet in length. The slab surface slopes along its entire length to a collection sump or the secondary containment area of the treating plant. An integral curb having a height of four (4) inches is located on the west side of the drip pad and the eastern edge is bounded by a raised berm formed in the concrete surface. The north side is sloped away from the slab edge and towards the collection sump of the secondary

containment area of the treating plant. The south edge of the pad either slopes into the collection sump or the secondary containment area of the treating plant."

See photograph #1 – 4 for pictures of each side of drip pad.

3. *During the April 8, 2004 inspection, the inspectors noted that a majority of the drip pad's surface was covered with a 1"-2" build-up of hardened creosote. Please refer to the photographs 5-9, attached hereto (Attachment No. 1). With regard to the buildup of hardened creosote, please answer the following:*

a) *How often (e.g., monthly, semi-annually, annually) is the hardened creosote removed from the surface of the drip pad? Please provide the basis for your knowledge and any and all supporting records:*

Response: The drip pad is cleaned on a weekly basis by sweeping and washing. The weekly cleaning provides sufficient removal of creosote for inspection of the pad for signs of cracks and gaps pursuant to the applicable regulation. On at least an annual basis, the drip pad is more thoroughly cleaned by scrapping all creosote off of the pad. All drip pad cleanings and inspections, both weekly and annual, have been documented and are included in Attachment E.

The Facility disagrees with the inspector's conclusion as stated in the Information Request Attachment No. 2, EPA's April 8, 2004 Compliance Evaluation Inspection Report, Section 5.1, Drip Pad, on Page 5: "Due to build-up of creosote, inspection of the pad for signs of cracks and gaps was impossible." It is the position of the Facility that the buildup of creosote did not preclude informative weekly inspections. The records of the weekly inspections provided in Attachment D document several weekly inspections where the need for repairs on the drip pad were detected, noted and performed.

b) *Please state in specific detail how, in the past, the Facility has removed the hardened creosote buildup from the surface of the drip pad.*

Response: The buildup is scrapped and the loosened material is then collected by sweeping, shoveling and placement into new 55-gallon drums. The drums are stored in a less-than 90-day storage area located on the drip pad and managed, manifested and disposed-of as F034 / F035 hazardous waste.

c) *Has the removal of the hardened creosote build-up been documented in a drip pad cleaning log? If so, please provide the Facility's drip pad cleaning log for the time period of April 1, 2003 up to the receipt of this letter.*

Response: Cleaning records for the drip pad have been documented and are enclosed in Attachment E

d) *Please state the date on which the creosote build-up was last removed from the surface of the drip pad. Please submit any and all supporting records of such removal.*

e) *Please state whether or not the Facility has any plans to remove the hardened creosote build-up observed on the drip pad during the April 2004 CEI. If so, please provide the date such removal is scheduled to take place the type of removal procedure to be used. If the hardened creosote build-up has already been removed, please submit photographs of the cleaned drip pad and records documenting how and when the removal took place.*

Response: The last more thorough cleaning of the drip pad began on April 13, 2004 and was completed April 27, 2004, following the April 8 2004 CEI (See Attachment E for documentation). Prior to the CEI inspection, the last more thorough cleaning of the pad was performed on May 12, 2003.

(See pictures #5 and #6 showing the pad after it was scrapped and clean).

4. *With regard to the forklift designated for the Facility's drip pad, please answer the following:*

a) *During the April 8, 2004 CEI, the EPA inspectors observed what appeared to be dirt tracks from the forklift on the Facility's drip pad. Please refer to photographs 4 and 5 attached hereto. Had the Facility, at any time or for any reason, removed the designated forklift from the drip pad to be used in another area of the Facility? If so, please explain in specific detail when and why the designated forklift was removed from the drip pad.*

Response: The designated forklift is not used in other areas of the Facility. The dirt tracks shown in photographs 4 and 5 in CEI are not from the pad designated forklift. Note that the tire tracks in the photos are single tires while the forklift has dual tires. The single tire tracks are from a maintenance vehicle that entered

the pad for an immediate repair. If the forklift does leave the pad, the tires are thoroughly pressure washed before departure and prior to reentry.

b) *Before removing the designated forklift from the drip pad, what steps were taken by the Facility to ensure the tracking of creosote of CCA waste to other areas of the Facility was minimized?*

Response: If the forklift is needed to be taken off of the pad for maintenance, the tires are pressure washed before exiting from and/or before returning to the pad.

c) *Please state the date on which the tires on the designated forklift were last replaced and provide any and all supporting documentation the Facility has on file.*

Response: Repair records for tire replacements are not maintained.

d) *Please state whether a "waste determination" and "LDR determination" was made on the used tires.*

e) *If a "waste determination" and "LDR determination" was made for the used tires, state when such determination was made.*

f) *Were the used tires determined to be "hazardous waste"? If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste.*

g) *State whether the hazardous waste determination was based on the generator's knowledge of the process that generated the waste, or on analytic results. If the determination was based on analytical results, provide any and all such results.*

Response: Used tires from the dedicated drip pad forklift are pressure washed prior to removal and managed as non-hazardous.

h) *Were the used tires shipped off-site for recycle (i.e., reclaim, re-use), treatment, storage, or disposal?*

i) *Please provide copies of **all** bills of lading, manifests (including hazardous manifests), shipping, invoices, and LDR notices and certifications that accompanied the off-site shipment of the used tires.*

Response: Used tires are either returned to the supplier for reclaim / reuse, or sent to disposal.

5. *During the April 2004 inspection, the inspectors observed used tires were being stored outside of the Facility's maintenance building. Please refer to photograph 18, attached hereto. With regard to the used tires, please answer the following:*

   a) *Please state the type of equipment the used tires were removed from and when.*

   Response: The tires are from forklifts and booms used throughout the facility.

   b) *Please state in specific detail how the equipment the used tires were removed from was primarily utilized by the Facility.*
   c) *State whether a "waste determination" and "LDR determination" was made for the used tires.*
   d) *If a "waste determination" and "LDR determination" was made for each of the used tires, state when such determination were made.*
   e) *Were any of the used tires determined to be "hazardous waste"? If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste.*
   f) *State whether the hazardous waste determination was based on the generator's knowledge of the process that generated the waste, or on analytical results. If the determination was based on analytical results, provide any and all such results.*
   g) *Were the used tires shipped off-site for recycle (i.e., reclaim, re-use), treatment, storage, or disposal?*
   h) *If the used tires were shipped off-site, provide copies of all bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipment of these used tires.*

   Response: See response to Question 4. Used tires are either returned to the supplier for reclaim / reuse, or sent to disposal.

6. *Please answer the following questions regarding shipments (product) of creosote and CCA received at the Facility:*

   a) *Please state how often the Facility receives shipments of product creosote?*
   b) *Please state if the shipments of creosote are delivered in bulk (i.e. tanker truck) or in containers (i.e. drums)?*

   Response: The Facility typically receives a tank truck shipment of creosote approximately three times per week.

c) *Where within the treatment building is the product creosote stored and in what type of unit (i.e. tank)?*

Response: Creosote is stored in creosote storage tanks located at the rear of the treatment building. (See Attachment F)

d) *Please submit a detailed building layout for the Facility's treatment building.*

Response: A sketch of the treatment building layout is enclosed in Attachment F.

e) *At what location within the Facility is the creosote unloaded (i.e. drip pad)?*

Response: The creosote unloading facility is a covered concrete pit located on the side of the treatment building. The pit is designed to provide containment for any accidental creosote spill (See photograph #7 for creosote unloading area).

f) *If the shipments of creosote are unloaded on the Facility's drip pad, please explain, in specific detail, the steps that are taken by the Facility to ensure hat the tracking of creosote or CCA waste off the drip pad is minimized from the time the truck enters the drip pad are until it exits.*

Response: The creosote unloading area is separate from the drip pad.

g) *Please explain in specific detail how the product creosote is unloaded into the storage unit?*

Response: The creosote tanker is backed into the concrete pit. A dedicated hose from the dedicated creosote unloading pump is attached to the tanker drain. Half barrels are placed beneath all connections for collection of any leakage during the pumping, and connection/disconnection process. All collected creosote is recycled back into the process.

h) *Please state how often the Facility receives shipments of product CCA?*
i) *Please state how if the shipments of CCA are delivered in bulk (i.e. tanker truck) or in containers (i.e. drums).*

Response: The Facility has typically received tank truck shipments of CCA approximately three times per year.

j) *Where within the treatment building is the CCA stored and in what type of unit (i.e. tank)?*

Response: CCA is stored in the 25,000 gallon storage tank located at the rear of the treatment building. (See Attachment F for relative location)

k) *At what specific location within the Facility is the CCA unloaded (i.e. drip pad)?*

Response: CCA is unloaded in the same covered concrete pit used for creosote, utilizing dedicated pump, piping and storage facilities (See Attachment E).

l) *If the shipments of CCA are unloaded on the Facility's drip pad, please explain, in specific detail, the steps that are taken by the Facility to ensure that the tracking of creosote of CCA waste off the drip pad is minimized from the time the truck enters the drip pad until the time it exits.*

Response: The CCA unloading area is separate from the drip pad.

m) *Please explain in specific detail how the CCA is unloaded into the storage unit?*

Response: See response to (g) above.

7. *While inspecting the Facility's less than 90-day hazardous waste accumulation area, the inspectors observed one 55-gallon container labeled with the words "Hazardous Waste" that was not marked with an accumulation start date. Please refer to photograph 13, attached hereto. With regard to this container:*

a) *Please provide a detailed description of the process or processes which generated the material in this container.*

b) *Describe the contents of the container observed during EPA's April 2004 CEI, and provide the basis for your knowledge of such contents.*

Response: The barrel contained sweepings from the drip pad. As stated on page 5 of the CEI Report in reference to the subject drum:

> "However, one of the full drums (not a satellite container) was missing an accumulation start date (Photograph No. 13). Ms. Henry spoke with Mr. Ronnie Stinnett, Treating Plant Supervisor, who stated the original "Hazardous Waste" label was covered with creosote and illegible, so a new "Hazardous Waste" label was put on the drum and he forgot to date

it. Mr. Stinnett marked the drum with an accumulation start date of 3/10/04."

c) *State whether a "waste determination" and "LDR determination" was made for the contents of this container.*

d) *If a "waste determination" and "LSR determination" were made for the contents of this container, state when such determination was made.*

e) *Were the materials in this container determined to be "hazardous waste"? If so, state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste.*

f) *State whether the hazardous waste determination was based on the generator's knowledge of the process that generated the waste, or on analytical results. If the determination was based on analytical results, provide any and all such results.*

Response: The drum was labeled as "hazardous waste" based on generator process knowledge. The specific EPA Hazardous Waste Codes associated with this waste are F034 / F035.

g) *Was this container shipped off-site for recycle (i.e. reclaim, reuse), treatment, storage, or disposal?*

h) *If this container was shipped off-site, provide copies of all bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipment of this container.*

Response: The material was shipped off-site for disposal on May 4, 2004. A copy of the hazardous waste manifest 04-002 is enclosed in Attachment G.

8. *Please submit any and all manifests retained by the Facility for off-site shipments of hazardous waste that occurred in each of the following calendar years: 2000, 2001, 2002, 2003, and 2004.*

Response: The requested manifests are enclosed in Attachment H.

9. *Please submit any and all LDR Notification forms retained by the Facility for off-site shipments of hazardous waste that occurred in each of the following calendar years: 2000, 2001, 2002, 2003, and 2004.*

Response: The requested LDR Notification forms are attached to the manifests and are enclosed in Attachment H.

10. During EPA's April 8, 2004 CEI, the inspectors observed a large wooden bin used by the Facility to accumulate regular plant trash, which was located adjacent to the less than 90-day hazardous waste accumulation area. Please refer to photographs 14 and 15, attached hereto. Inside the bin, the inspectors observed gloves, a section of 3" hose, and metal bands to be disposed, all of which were contaminated with creosote. In addition, the inspectors observed sweepings and a number of used aerosol cans in the trash bin.

With regard to the creosote contaminated gloves, 3" sections of hose and metal bands:

a) Please provide a detailed description of the process or processes which generated each of these materials.

Response: The materials observed by the CEI inspectors during the inspection came from the following sources:

Gloves – Used to handle treated material.
3" Hose Section – Removed from a suction hose.
Metal Bands – Broken bands from busted packaged materials
Sweepings – Swept material from the drip pad.
Empty Aerosol Cans – Paint used to mark finished material.

b) State whether a "waste determination" and "LDR determination" was made for each of these materials.

c) If a "waste determination" and "LDR determination" was made for each of these materials, state when such determinations were made.

d) Were each of these materials determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste.

e) State whether the hazardous waste determination was based on the generator's knowledge of the process that generated the waste, or on analytical results. If the determination was based on analytical results, provide any and all such results.

Response: A "waste determination" and "LDR determination" was made for this material based on generator process knowledge. The waste was determined to be "hazardous waste" and stored, manifested and shipped as F034/F035 wastes. The wastes had been incorrectly placed in the non-hazardous waste container.

f) Were these materials shipped off-site for recycle (i.e. reclaim, re-use), treatment, storage, or disposal?

g) If the material shipped off-site, provide copied of all bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipments of these materials.

Response: The waste materials were shipped off-site for disposal. Manifest 04-002, dated May 4, 2004 is enclosed in Attachment G. The LDR notice is attached to the manifest.

With regard to the sweepings:

h) Please provide a detailed description of the process or processes which generated each of these sweepings.

i) State whether a "waste determination" and "LDR determination" was made for each of the sweepings.

j) If a "waste determination" and "LDR determination" was made for the sweepings, state when such determinations were made.

k) Were the sweepings determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste.

l) State whether the hazardous waste determination was based on the generator's knowledge of the process that generated the waste, or on analytical results. If the determination was based on analytical results, provide any and all such results.

m) Were the sweepings shipped off-site for recycle (i.e. reclaim, re-use), treatment, storage, or disposal?

n) If the sweepings were shipped off-site, provide copied of all bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipments of these materials.

Response: The sweepings are from the weekly cleanings of the drip pad. A "waste determination" and "LDR determination" was made for this material based on generator process knowledge. The waste was determined to be "hazardous waste" and stored, manifested and shipped as F034/F035 wastes. The waste materials were shipped off-site for disposal. Manifest 04-002, dated May 4, 2004 is enclosed in Attachment G. The LDR notice is attached to the manifest.

With regard to the aerosol cans:

o) Please provide a detailed description of the process or processes which generated the aerosol cans.

p) Describe the contents of the used aerosol cans observed during the EPA's April 2004 CEI, and provide the basis of your knowledge of such contents.

q) Provide the Material Safety Data Sheets (MSDS) for the used aerosol cans observed during the CEI.

Response: The aerosol cans were empty cans previously containing paint manufactured by the Rust-Oleum Corporation. The paint was used to mark finished product. An MSDS for the paint cans is provided in Attachment I.

r) *State whether a "waste determination" and "LDR determination" was made for the aerosol cans.*

s) *If a "waste determination" and "LDR determination" was made for the used aerosol cans, state when such determinations were made.*

t) *Were the used aerosol cans determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste.*

u) *State whether the hazardous waste determination was based on the generator's knowledge of the process that generated the waste, or on analytical results. If the determination was based on analytical results, provide any and all such results.*

v) *Were the used aerosol cans shipped off-site for recycle (i.e. reclaim, re-use), treatment, storage, or disposal?*

w) *If the used aerosol cans were shipped off-site, provide copied of all bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipments of these materials.*

Response: No waste determination was made for the empty aerosol cans.

11. *During EPA's April 2004 CEI, the inspectors observed two open cardboard boxes containing bulbs. The boxes were located in a loft above the maintenance building. Please refer to photograph 19, attached hereto.*

With respect to the used bulbs:

a) *Provide the manufacture(s) model number(s) of the used lamps observed during EPA's April 2004 CEI.*

Response: 4-Foot General Electric Model Number F400CW-RS-WM
8-Foot General Electric Model Number F96T-CW-WM

b) *State whether a waste determination has been done on the used lamps. If so, provide the results of each determination performed or relied on by the Facility for purposes of managing and disposing of used lamps. Include with this description all information on which such determination were based including but not limited to, knowledge of the hazard characteristics of the waste in light of the materials or the process used, Material Safety Data Sheets (MSDSs), results of chemical or physical analyses, and any other information used to make this*

determination. State the Facility's management rationale for determining which used lamps were hazardous and which were non-hazardous.

c) *State whether the used lamps observed during EPA's April 2004 CEI were shipped off-site. If the used lamps were shipped off-site, describe the procedures used for handling and storing the lamps prior to each shipment.*

d) *State the name and address of the destination facility(s) to which the used lamps were sent, and copies of any and all documents pertaining to shipments to such facility(s).*

Response: The bulbs are managed as a Universal Waste based on the MSDS and were shipped October 13, 2004 to the following vendor - permitted to handle Universal Wastes:

EQUIS Transfer and Processing
1010 Old Rawsonville Road
Ypsilanti, Michigan 48197

Bill of Lading are enclosed in Attachment J.

12. *With respect to BPB's Goshen, VA Facility's RCRA training program, please answer the following:*

a) *Provide the name and position of those employees that are/were responsible for the management of hazardous waste at the BPB's Goshen, VA Facility for the time period of April 1, 2000 up to the receipt of this letter. This would include, but not be limited to, persons responsible for the labeling, dating and inspecting of containers of hazardous waste, inspecting and cleaning the drip pad, signing of manifests and LDR notices, waste determinations, emergency coordinators, and hazardous waste training instructors.*

b) *State whether or not the Facility keeps on file documented job titles, which includes the name of the employee, for those employees listed in answer to Question 12.a. above. If so, please submit the Facility's documented job titles of those employees at the Facility that are/were involved in the management of hazardous waste for the time period of April 1, 2000 up to the receipt of this letter.*

c) *State whether or not the Facility keeps on file documented job descriptions for those employees listed in answer to Question 12.a., above. If so, please submit the Facility's documented job descriptions of those employees at the Facility that are/were involved in the management of hazardous waste* ***for the time period of April 1, 2000 up to the receipt of this letter.***

Response: The requested names, positions, current employee status and job descriptions are enclosed in Attachment K.

d) *Submit all RCRA training records the Facility has on file for those employees that are/were involved in the management of hazardous waste* ***for the time period of April 1, 2000 up to the receipt of this letter.***

Response: The requested training records are enclosed in Attachment L.

e) *State whether or not the Facility has documentation stating the amount of introductory and continuing training the Facility requires for those employees responsible for the management or hazardous waste. If so, submit the Facility's* ***documentation of the type and amount of both introductory and continuing training*** *that is required for each person filling a position involving the management of hazardous waste at the Facility.*

Response: The annual training required is defined on Page 5 of the Spill Prevention, Control and Countermeasures Plan (see Attachment M).

13. *During EPA's April 8, 2004 CEI, the inspector reviewed the Facility's contingency plan. With regard to the contingency plan, please answer the following questions.*

a) *Has a copy of the plan been submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services? If so, please provide any and all documentation your Facility has on record to support your claim.*

Response: All local police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services have been provided with a copy of the Facility's Contingency Plan. Receipt documentation for the 2004 plan is enclosed in Attachment N.

b) *Please provide a copy of the Facility's contingency plan that was in effect and reviewed by the EPA Inspector in April 8, 2004.*

Response: A copy of the Facility's Contingency Plan as revised February 2004 is enclosed in Attachment O.

c) *Provide the name of each employee that was listed as an Emergency Coordinator in the Facility's contingency plan that was in effect and reviewed by the EPA Inspector in April 8, 2004.*

d) *For each employee listed in response to question 13.c, please specify the employee's status at the Facility (i.e. employed, non-employee) as of April 8, 2004.*

Response: Following is the list of employees and their employment status on April 8, 2004, who were listed as an Emergency Coordinator in the Facility's Contingency Plan that was in effect at the time of the April 8, 2004 CEI.

Doug Gentry	Employed
Randy Cottrill	Employed
Ronnie Stinnett	Employed
Henry Brooks	Employed
Larry Snyder	Employed

Enclosed in Attachment P is Page 12 from the Facility's contingency plan which lists the Emergency Coordinators.

e) *Have any updates been made to the Facility's contingency plan since the April 2004 CEI? If so, please submit a copy of the contingency plan and specify as to what updates were made.*

Response: No updates have been made to the Facility's Contingency Plan since the April 2004 CEI.